

NOTICE TO CEASE AND DESIST FROM WATTS GUERRA

From:

Mikal Watts, Francisco Guerra, IV, and Paige Boldt
4 Dominion Drive, Bldg. 3, Ste. 100
San Antonio, Texas 78257

Date April 21, 2022

Re: Notice to Cease and Desist the Use of Watts Guerra's Name, Materials, and Likeness

Dear Berken Media and its owners and agents, Robert Kenyon, gurusagent.com and its owners and agents, Consumer Case Helpline and its owners and agents, Susana Valenzuela, and Ana Gutierrez:

This letter is served upon you due to your unauthorized use of documents purporting to be Watts Guerra's client contracts relating to the Zantac litigation, and other documents, and of Watts Guerra's name and likeness in telephone calls, emails, and other unknown and unauthorized communications ("Activity").

We hereby demand that you immediately CEASE and DESIST from engaging in the aforementioned Activity. If you fail to do so, we will commence a lawsuit against you.

We have been notified that you are sending out the attached documents from the attached email addresses and communicating as though you have been authorized to do so by Watts Guerra, when you have not been so authorized. If the Activity continues, we will immediately seek a temporary restraining order against you and any others complicit in this matter and commence a lawsuit against you.

Accordingly, if you do not confirm in writing to us by the 2nd day of May, 2022 that you have ceased the aforementioned illegal Activity, we will file a lawsuit against you seeking all legal and equitable remedies allowed by law, including money damages.

Sincerely,

A handwritten signature in black ink that reads "Mikal Watts". The signature is written in a cursive, flowing style.